# IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

KEITH COLE, JACKIE BRANNUM,	§	
RICHARD KING, FRED WALLACE,	§	
LAVAR SANTEE, and MARVIN RAY	§	
YATES, individually and on behalf of	§	
those similarly situated,	§	
Plaintiffs,	§	
	§	
v.	§	CIVIL ACTION NO. 4:14-CV-1698
	§	
	§	
BRYAN COLLIER, in his official	§	
capacity, ROBERTO HERRERA, in his	§	
official capacity, and TEXAS	§	
DEPARTMENT OF CRIMINAL	§	
JUSTICE,	§	
Defendants.	§	

# DEFENDANTS' VERIFIED STATUS REPORT REGARDING AIR CONDITIONING AT TDCJ FACILITIES HOUSING CLASS MEMBERS: June 2022

KEN PAXTON	
Attorney General of Texas	TED A. ROSS
BRENT WEBSTER First Assistant Attorney General	Assistant Attorney General Attorney-in-Charge State Bar No. 24008890 Southern District ID No. 22658
GRANT DORFMAN	Ted.Ross@oag.texas.gov
Deputy First Assistant Attorney General	Tea.Ross@oag.texas.gov
SHAWN E. COWLES Deputy Attorney General for Civil Litigation	CHARLES K. ELDRED State Bar No. 00793681 Special Litigation Counsel
SHANNA E. MOLINARE Chief, Law Enforcement Defense Division	BENJAMIN DOWER State Bar No. 24082931 Assistant Attorney General
Office of the Attorney General	1 10010 10011 1 10001110 y 3 0110101
P.O. Box 12548 Austin, Texas 78711-2548 512-463-2080 • fax 512-370-9069	JEANINE COGGESHALL State Bar No. 24083162 Assistant Attorney General

Defendants, Bryan Collier and Robert Herrera, in their official capacities, and the Texas Department of Criminal Justice (Defendants), by and through the Office of the Attorney General, file this Verified Status Report Regarding Air Conditioning at TDCJ Facilities Housing Class Members. Included with this court filing are the verified temperature logs from June 1-30, 2022, for all locations within TDCJ where class members may be housed.

Dated: July 22, 2022

Respectfully Submitted,

# **KEN PAXTON**

Attorney General of Texas

# **BRENT WEBSTER**

First Assistant Attorney General

#### **GRANT DORFMAN**

Deputy First Assistant Attorney General

# **SHAWN E. COWLES**

Deputy Attorney General for Civil Litigation

#### **SHANNA E. MOLINARE**

Chief, Law Enforcement Defense Division

# /s/ Ted A. Ross

# **TED A. ROSS**

State Bar No. 24008890 Assistant Attorney General

#### CHARLES K. ELDRED

State Bar No. 00793681 Special Litigation Counsel

#### **BENJAMIN DOWER**

State Bar No. 24082931 Assistant Attorney General

#### **JEANINE COGGESHALL**

State Bar No. 24083162 Assistant Attorney General Office of the Attorney General of Texas P. O. Box 12548, Capitol Station

Austin, Texas 78711 P: (512) 475-4191

F: (512) 457-4674

Ted.Ross@oag.texas.gov

Charles.Eldred@oag.texas.gov

Benjamin.Dower@oag.texas.gov

Jeanine.Coggeshall@oag.texas.gov

#### ATTORNEYS FOR DEFENDANTS

# NOTICE OF ELECTRONIC FILING

I, Ted A. Ross, Assistant Attorney General of Texas, do hereby certify that I have electronically submitted for filing, a correct copy of the foregoing in accordance with the Electronic Case Files System of the Southern District of Texas, on July 22, 2022.

/s/ Ted. A. Ross
Ted A. Ross
Assistant Attorney General

# **CERTIFICATE OF SERVICE**

I, Ted A. Ross, Assistant Attorney General of Texas, do hereby certify that a true and correct copy of the above and foregoing has been served on all counsel of record via electronic mail on July 22, 2022, as authorized by Fed. R. Civ. P. 5(b)(2) and in accordance with the electronic case filing procedures of the United States District Court for the Southern District of Texas.

/s/ Ted. A. Ross

Ted A. Ross

Assistant Attorney General